

1 Jeffrey H. Howard (*pro hac vice*)
2 Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
3 1001 Pennsylvania Ave. N.W.
Washington, D.C. 20004
4 Telephone: (202) 624-2500
Facsimile: (202) 628-5116
5 Email: jmurphy@crowell.com

6 Jason C. Murray, Esq. (State Bar No. 169806)
7 CROWELL & MORING LLP
515 South Flower Street, 40th Floor
8 Los Angeles, CA 90071
Telephone: (213) 622-4750
9 Facsimile: (213) 622-2690

10 *Counsel for Plaintiffs Target Corporation; Sears,
11 Roebuck and Co.; Kmart Corporation; Old Comp
Inc.; Good Guys, Inc.; RadioShack Corporation;
and Newegg Inc.*

12 [Additional Counsel Listed on Signature Page]

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17
18 IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

19
20 **Case No. M 07-1827 SI
MDL No. 1827**

21
22 This Document Relates to Individual Case No.
3:10-cv-04945

23
24
25
26
27
28 **STIPULATION AND [PROPOSED]
ORDER REGARDING SERVICE AND
SCHEDULING**

TARGET CORP., et al.

Plaintiffs,

v.

AU OPTRONICS CORPORATION, et al.,

Defendants.

1 WHEREAS the undersigned counsel, on behalf of their respective clients, plaintiffs Target
2 Corp., Sears, Roebuck and Co., Kmart Corp., Old Comp Inc., Good Guys, Inc., RadioShack Corp.,
3 and Newegg Inc. (collectively, "Plaintiffs") filed a complaint in the above-captioned case against
4 HannStar Display Corporation ("HannStar") and other defendants on November 1, 2010
5 ("Complaint");

6 WHEREAS Plaintiffs wish to avoid the burden and expense of serving process on
7 HannStar;

8 WHEREAS HannStar desires a reasonable amount of time to respond to the Complaint;

9 WHEREAS Plaintiffs and HannStar believe that proceeding on a unified response date will
10 create efficiency for the Court and the parties by reducing duplicative motion practice;

11 THEREFORE, Plaintiffs and HannStar hereby agree:

- 12 1. HannStar waives service of the Complaint under Federal Rule of Civil Procedure
13 4(d). This stipulation does not constitute a waiver by HannStar of any other
14 substantive or procedural defense, including but not limited to the defense of lack
15 of personal or subject matter jurisdiction and improper venue.
- 16 2. HannStar's deadline to move to dismiss, answer, or otherwise respond to the
17 Complaint is April 27, 2011, which is the same response date for other defendants
18 named in the Complaint, as established by the Stipulation and Order Regarding
19 Service and Scheduling entered by the Court on January 28, 2011 [Individual
20 Docket No. 12].

21
22 IT IS SO STIPULATED

23 DATED: February 16, 2011

24

25

26

27

28

1 CROWELL & MORING LLP
2

3 By: /s/ Jerome A. Murphy
4 Jerome A. Murphy

5 JEFFREY H. HOWARD (*pro hac vice*)
6 JEROME A. MURPHY (*pro hac vice*)
7 1001 Pennsylvania Avenue, N.W.
8 Washington, DC 20004
9 Phone: (202) 624-2500
10 Fax: (202) 628-5116
11 *jmurphy@crowell.com*

12 JASON C MURRAY
13 515 South Flower Street, 40th floor
14 Los Angeles, CA 90071
15 Tel: (213) 422-5582
16 Fax: (213) 622-2690

17 Attorneys for PLAINTIFFS TARGET CORP., SEARS,
18 ROEBUCK AND CO., KMAR CORP., OLD COMP INC.,
19 GOOD GUYS, INC., RADIOSHACK CORP., and
20 NEWEGG INC.

21 K&L GATES LLP

22 By: /s/ Hugh F. Bangasser
23 Hugh F. Bangasser

24 HUGH F. BANGASSER (*pro hac vice*)
25 RAMONA M. EMERSON (*pro hac vice*)
26 CHRISTOPHER M. WYANT (*pro hac vice*)
27 JEFFREY L. BORNSTEIN
28 925 Fourth Avenue, Suite 2900
Seattle, Washington 98104
Phone: (206) 623-7580
Fax: (206) 623-7022
Hugh.Bangasser@klgates.com

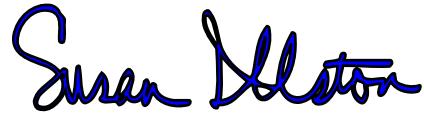
Attorneys for DEFENDANT HANNSTAR DISPLAY
CORPORATION

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of
this document has been obtained from Hugh F. Bangasser.

1 **[PROPOSED] ORDER**
2

3 IT IS SO STIPULATED. ORDERED
4

5 DATED this 11TH day of FEB, 2011.
6

7 
8

9

10 Hon. SUSAN ILLSTON
11

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

crowell & moring
1001 Pennsylvania Ave., N.W.
Washington, DC 20004
(202) 624-2500